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United States District Court
Southern District of Texas
FILED

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David J. Bradley, Clerk of Court

211-CV-00027
CR 550

Interrogatories for Defendants Gonzales and Crites

Pursuant to Rule 33 and 34, Fed.R.Civ.P., the plaintiff submits the following interrogatories to the defendants. You are directed to answer each of the interrogatories in writing under oath, and provide the plaintiff with the results within 30 days after the service of the request.

Interrogatories for Adam Gonzales:

1. What unit did you work at prior to being promoted to major on the McConnell Unit?
2. What rank did you carry at the prior unit?
3. Was Daniel Fernandez working on that unit when you worked there?
4. If so, what rank did Fernandez carry on that unit?
5. Was Fernandez, in any way, instrumental in your promotion to major?
6. Was Fernandez your supervisor at the previous unit?
7. How long have you personally known Daniel Fernandez?
8. Would you consider Daniel Fernandez a friend?

Interrogatories for Richard Crites:

1. How long have you known Daniel Fernandez?
2. How long have you known Adam Gonzales?
3. To your knowledge, when Adam Gonzales was promoted to major and assigned to McConnell Unit, was Daniel Fernandez instrumental in any way in Gonzales' promotion?
~~4. To your knowledge, would you say Daniel Fernandez have a close working relationship?~~
4. To your knowledge or observance, would you say Fernandez and Gonzales are friends?
5. To your knowledge, would you say Gonzales and Fernandez have or had a close working relationship?

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